

18-June-2021

David Albright  
Manager, Groundwater Protection Section  
U.S. Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, California 94105

RE: Response to EPA's Requested Updates to Permit Application CES-Mendota Site Underground Injection Control (UIC) Permit Application Class VI Pre-Construction Permit Application No. R9UIC-CA6-FY20-1

Dear Mr. Albright,

Clean Energy Systems, Inc. (CES) thanks you and the staff at the United States Environmental Protection Agency (EPA) for your review of our Class VI Pre-Construction Underground Injection Control (UIC) Permit Application for the Mendota site.

Per your Requested Updates to the subject application, dated 29-April-2021, we are providing the Pre-Construction Updates (Anticipated To Be Made Now) to the following documents:

- Class VI Permit Application Narrative 40 CFR 146.82(A) Clean Energy Systems Mendota
- Attachment A: Summary of Requirements Class VI Operating and Reporting Conditions
- Attachment B: Area of Review and Corrective Action Plan
- Attachment C: Testing and Monitoring Plan
- Attachment D: Injection Well Plugging Plan
- Attachment E: Post-Injection Site Care and Site Closure Plan
- Attachment F: Emergency and Remedial Response Plan
- Attachment G: Construction Details
- Quality Assurance and Surveillance Plan

CES worked with technical experts at Schlumberger to complete the revisions.

To protect confidential business information (CBI), a version of the Application Narrative with CBI removed will be submitted through the EPA's online Geologic Sequestration (GS) Data Tool, while a second version, containing CBI, will be transmitted to EPA through a secure means.

At this time, we are not providing an update to:

- Attachment H: Financial Assurance Demonstration



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We are continuing to refine and optimize the Financial Assurance plan for the Mendota site and wish to discuss the matter with you further. I will reach out separately to set up a meeting on the topic in the coming weeks.

CES acknowledges EPA anticipates post-construction changes and updates that CES will need to incorporate into the application materials after pre-operational testing is completed.

We thank you for the productive dialogue regarding our Class VI UIC permit application to date. If you have any questions, please contact me at [rhollis@cleanenergysystems.com](mailto:rhollis@cleanenergysystems.com).

Sincerely,



Rebecca M. Hollis  
CES Director of Business Development – CNE

***Attachments***

CC (via email):      Keith Pronske, CES President & CEO  
                              Natalie Nowiski, Schlumberger NE CCS BD and Legal Counsel  
                              Vivian Rohrback, Schlumberger D&I Project Manager